UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

L.J., individually and on behalf of B.A.J., a child with a disability,

Plaintiffs,

Plaintiffs,

Case No. 23-cv-7267 (ER)(SDA)

-against
New York City Department of Education and DAVID BANKS, in his official capacity as

Chancellor of the New York City School District,

Defendants.

PLEASE TAKE NOTICE that Plaintiffs L.J. on behalf of B.A.J., by and through their undersigned counsel, based on the accompanying Memorandum of Law, Plaintiff's Statement of Undisputed Material Facts, the Declaration of Nathan J. Ades dated February 9, 2024, plus the exhibits attached thereto, the Declaration of Rebecca C. Shore dated February 9, 2024, plus the exhibits attached thereto, the Declaration of Rita Rodriguez dated February 8, 2024, plus the exhibits attached thereto, the Declaration of Jared Stein dated February 7, 2024, the Declaration of Nelson Mar dated February 8, 2024, the Declaration of Jesse Cole Culter dated February 8, 2024, the Declaration of Nancy Rothenberg dated February 8, 2024, and all papers previously filed with the Court, L.J. on behalf of B.A.J, will move this court, before the Honorable Edgardo Ramos, United States District Judge, at the United States Courthouse, 40 Foley Square, New York, NY 10007, in Courtroom 619, at a date and time determined by the Court, for summary judgment pursuant to the Federal Rule of Civil Procedure 56.

Dated: New York, NY February 9, 2024

GLENN AGRE BERGMAN & FUENTES LLP

By: /s/ Nathan Joseph Ades
Nathan Joseph Ades

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ADVOCATES FOR CHILDREN OF NEW YORK, INC.

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Attorneys for Plaintiffs